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*Counsel for Alfred H. Siegel, the Liquidating Trustee
of Circuit City Stores, Inc. Liquidating Trust*

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:

Circuit City Stores, Inc., et al.,

Debtor(s).

Chapter 11

Case No. 08-35653-KRH

Jointly Administered

MOTION FOR ADMISSION PRO HAC VICE

Dena S. Kessler, (the “Movant”) an attorney and a member in good standing of the bars of the District of Columbia, the state of Virginia, the United States District Court for the Eastern District of Virginia (the “District Court”) and the United States Bankruptcy Court for the Eastern District of Virginia (the “Bankruptcy Court”), and an associate with Baker & Hostetler LLP (“BH”) hereby moves (the “Motion”) the Bankruptcy Court to enter an order, the proposed form of which is attached hereto as Exhibit “B”, authorizing Ashley M. McDow of BH (the “Admittee”) to appear *pro hac vice* before the Bankruptcy Court to represent the Circuit City Stores, Inc. Liquidating Trust (the “Liquidating Trust” and/or “Trust”), through Alfred H. Siegel, the duly appointed trustee of the Trust (the “Trustee”), pursuant to the Second Amended Joint Plan of Liquidation of Circuit City Stores, Inc. and its Affiliated Debtors and Debtors in Possession and its Official Committee of Creditors Holding General Unsecured Claims in the

above-captioned cases of the above referenced estates (the “Estates”) of Circuit City Stores, Inc. et al. (collectively, the “Debtors”) pursuant to Rule 2090-1(E)(2) of the Local Rules of the Bankruptcy Court (the “Local Rules”). In support of this motion, the Movant respectfully represents as follows:

1. The Admittee is counsel at BH, and her office is located at 11601 Wilshire Blvd., 14th Floor, Los Angeles, CA 90025-0509.

2. The Admittee is admitted, practicing, and in good standing as a member of the bars of the states of California and Washington. Among other courts, she is admitted to practice before the United States District Courts of the Northern, Southern, Eastern and Central District of California. The Admittee has been practicing since 2006.

3. The Admittee is a member in good standing and eligible to practice in each jurisdiction in which she has been admitted to practice. There are no disciplinary proceedings pending against the Admittee in any jurisdiction and she has never been suspended or disbarred in any jurisdiction. The Admittee understands that if she is admitted *pro hac vice*, she will be subject to the disciplinary jurisdiction of this Bankruptcy Court.

4. The Admittee has represented numerous companies in out-of-court restructurings and chapter 11 reorganizations. The Admittee presently serves as the Vice Chair on the Commercial Law Executive Committee of the Los Angeles County Bar Association.

5. The Movant requests that the Bankruptcy Court grant the Motion so that the Admittee may appear *pro hac vice* before the Bankruptcy Court to file pleadings and appear and be heard at hearings in this chapter 11 case in accordance with the requirements of Local Rule 2090-1 (E)(2).

6. The Court’s form “*Application to Qualify as a Foreign Attorney Under Local Bankruptcy Rule 2090-1(E)(2)*” in support of the Motion is attached herewith and incorporated herein by reference as Exhibit “A”.

Waiver of Memorandum of Law

7. The Movant respectfully requests that this Bankruptcy Court treat this Motion as a written memorandum of points and authorities or waive any requirement that this Motion be accompanied by a written memorandum of points and authorities as described in Local Rule 9013-1(G).

No Prior Request

8. No prior request for the relief sought herein has been made to this Bankruptcy Court or to any other court in these bankruptcy cases.

Notice

9. Notice of this Motion has been provided to the Office of the United States Trustee for the Eastern District of Virginia, Richmond Division, counsel to the above-captioned debtors, and counsel to the creditor's committee. Due to the administrative nature of the relief requested herein, Movant submits that no other or further notice need be given.

WHEREFORE, the Movant respectfully requests that the Bankruptcy Court enter an order substantially in the form attached hereto as Exhibit "B", (i) authorizing the Admittee to appear *pro hac vice* in association with the Movant as attorneys for the Trustee and (ii) granting such other and further relief as is just and proper.

Dated: January 29, 2015

Respectfully submitted,

BAKER & HOSTETLER LLP

By: /s/ Dena S. Kessler

Dena S. Kessler (VBN 78680)

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*Counsel for Alfred H. Siegel, the Liquidating
Trustee of Circuit City Stores, Inc. Liquidating
Trust*

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of January, 2015, a true and accurate copy of the foregoing was electronically filed with the Clerk of the Court for the Eastern District of Virginia, using the CM/ECF system, which thereby caused the above to be served electronically on all registered users of the ECF system that have filed notices of appearance in this matter, and sent via email to the following:

Paula S. Beran, Esquire
Tavenner & Beran, PLC
Counsel to Circuit City Stores, Inc.
Liquidating Trust

Gillian N. Brown, Esquire
Pachulski Stang Ziehl & Jones, LLP
*Counsel to the Unsecured Creditors
Committee*

Robert VanArsdale, Esquire
Office of the US Trustee

/s/ Dena S. Kessler

EXHIBIT “A”

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA

APPLICATION TO QUALIFY AS A FOREIGN ATTORNEY UNDER
LOCAL BANKRUPTCY RULE 2090-1(E)(2)

In Case No.: 08-35653, * Case Name Circuit City Stores, Inc., et al.,

PERSONAL STATEMENT

FULL NAME (no initials, please) Ashley M. McDow
Bar Identification Number 245114 State CA
Firm Name Baker & Hostetler LLP
Firm Phone # 310-820-8800 Direct Dial # 310-442-8846 FAX # 310-820-8859
E-Mail Address amedow@bakerlaw.com
Office Mailing Address 11601 Wilshire Boulevard, Suite 1400, Los Angeles, CA 90025-0509
Name(s) of federal court(s) in which I have been admitted U.S. District Courts: Northern, Southern, Eastern & Central CA

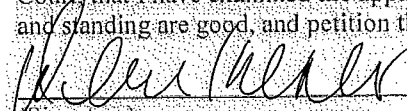
I certify that the rules of the federal court in the district in which I maintain my office extend a similar *pro hac vice* admission privilege to members of the bar of the Eastern District of Virginia.

I have not been reprimanded in any court nor has there been any action in any court pertaining to my conduct or fitness as a member of the bar.

I hereby certify that, within 90 days before the submission of this application, I have read the Local Rules of this Court and that my knowledge of the Federal Rules of Civil Procedure, the Federal Rules of Bankruptcy Procedure, and the Federal Rules of Evidence is current.


(Applicant's Signature)

I, the undersigned, do certify that I am a member of the bar of this Court, not related to the applicant; that I know the applicant personally, that the said applicant possesses all of the qualifications required for admission to the bar of this Court; that I have examined the applicant's personal statement. I affirm that his/her personal and professional character and standing are good, and petition the court to admit the applicant *pro hac vice*.


(Signature)

1/27/2015
(Date)

Dena S. Kessler
(Typed or Printed Name)

**Pro hac vice* admission in a case shall include an adversary proceeding(s) in the case.

Court Use Only:

The motion for admission is GRANTED _____ or DENIED _____

(Judge's Signature)

(Date)

EXHIBIT “B”

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re:

CIRCUIT CITY STORES, INC., ET AL.,

Debtor(s).

Case No. 08-35653-KRH

Chapter 11

Jointly Administered

**ORDER GRANTING MOTION TO APPEAR PRO HAC VICE PURSUANT TO LOCAL
BANKRUPTCY RULE 2090-1(E)(2)**

THIS MATTER having come before the Court upon the Motion to Appear *Pro Hac Vice* pursuant to Local Bankruptcy Rule 2090-1(E)(2)(the “Motion”) of Dena S. Kessler, counsel with the law firm of Baker & Hostetler LLP (“BH”), for the admission *pro hac vice* of Ashley M. McDow of BH, the Court finds that (i) it has jurisdiction over the matters raised in the Motion pursuant to 28 U.S.C. §§ 157 and 1334, (ii) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), (iii) the relief requested in the Motion is in the best interests of the estates and their creditors, (iv) proper and adequate notice of the Motion and the hearing thereon has been given and that no other or further notice is necessary, and (v) good and sufficient cause exists for the granting of the relief requested in the Motion after having given due deliberation upon the Motion and all of the proceedings had before the Court in connection with the Motion. Therefore,¹

IT IS HEREBY ORDER, ADJUDGED, AND DECREED THAT:

1. The Motion is GRANTED.
2. Ashley M. McDow is permitted to appear *pro hac vice* as counsel to the Trustee in the above-captioned chapter 11 cases in accordance with Local Bankruptcy Rule 2090-1(E)(2).

¹ Capitalized terms have the same meaning as in the underlying Motion.

Date: _____

U.S. Bankruptcy Judge

Entered on Docket: _____

We ask for this:

/s/ Dena S. Kessler

DENA S. KESSLER (VBN 78680)

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*Counsel for Alfred H. Siegel, the Liquidating Trustee
of Circuit City Stores, Inc. Liquidating Trust*

LOCAL BANKRUPTCY RULE 9022-1 (C) CERTIFICATION

The foregoing Order was endorsed by and/or served upon all necessary parties pursuant to Local Rule 9022-1(C).

/s/ Dena S. Kessler

Dena S. Kessler (VBN 78680)

Parties to Receive Copies

Paula S. Beran, Esquire
Tavenner & Beran, PLC
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Richmond, VA 23219
*Counsel to Circuit City Stores, Inc.
Liquidating Trust*

Gillian N. Brown, Esquire
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San Francisco, CA 9411
*Counsel to the Unsecured Creditors
Committee*

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